

AFFIDAVIT

I, REBECCA LIMAGE, state:

INTRODUCTION AND AGENT BACKGROUND

1. I have been a Special Agent with the Internal Revenue Service, Criminal Investigation (“IRS-CI”) since January 2019. I have conducted criminal investigations and assisted other IRS agents conducting investigations involving tax evasion, money laundering, and wire fraud, among other federal criminal offenses. I am a law enforcement officer of the United States and am empowered by law to conduct investigations and to make arrests for violations of federal criminal law.

2. I submit this affidavit in support of an application for a criminal complaint charging BENJAMIN PREACHER with money laundering, in violation of 18 U.S.C. § 1957, of the proceeds of interstate transportation of stolen goods, in violation of 18 U.S.C. § 2314, and for a warrant for PREACHER’s arrest.

3. Based on my training and experience, I know that 18 U.S.C. § 2314 is a “specified unlawful activity” for the purposes of 18 U.S.C. § 1957.

4. The facts in this affidavit come from my personal knowledge, information provided to me by other law enforcement agents, and my review of records described herein. This affidavit is not intended to set forth all of the information that I have learned during this investigation and includes only the information necessary to establish probable cause for the requested complaint and arrest warrant.

PROBABLE CAUSE TO BELIEVE THAT A FEDERAL CRIME WAS COMMITTED

Background

5. Victim Company 1 manufactures and sells luxury items, including jewelry made

from gold, silver, and platinum. Victim Company 1 operates a manufacturing facility in Rhode Island.

6. According to representatives of Victim Company 1, PREACHER worked full time for the company as a “Manufacturing Supervisor” at its Rhode Island facility from 2018 through March 2024, where he had access to gold, platinum, and silver as part of his work.

7. According to Victim Company 1 records, including tax records, bank records, and other business records, PREACHER has lived in North Attleboro, Massachusetts since 2018.

March 1, 2024 Theft of White Gold

8. Victim Company 1 representatives reported to the FBI that on or about March 1, 2024, PREACHER stole precious metal from Victim Company 1. Specifically, approximately 30 minutes into PREACHER’s shift at Victim Company 1 that day, PREACHER stole a piece of white gold “flat stock,” measuring approximately an inch in diameter and approximately as thick as a quarter, valued at roughly \$2,200.

9. According to Victim Company 1’s security personnel, cameras recorded PREACHER “palming” the flat stock and then putting it into his pocket.

10. The cameras also recorded that when PREACHER left the company’s Rhode Island facility at approximately 6:30 a.m., he placed his security badge holder on top of the exit x-ray machine, walked through the x-ray, and reached back to get his badge holder. PREACHER then walked to his car.

March 14, 2024 Admission of Theft to Victim Company 1

11. On or about March 14, 2024, Victim Company 1’s personnel asked PREACHER about stolen metal, and PREACHER wrote and signed a statement, stating, in substance:

a. He stole the white gold “flat stock”;

- b. He stole precious metals from Victim Company 1, starting in 2018; and
- c. He sold the metals he sold to a gold buyer.

March 14, 2024 Admission of Theft to IRS

12. On or about March 14, 2024, I interviewed PREACHER at his North Attleboro home. In the course of the interview, PREACHER confirmed that he lived there.

13. I asked PREACHER about his sales of precious metals, including gold, silver, and platinum, to metals dealers in Massachusetts, and PREACHER stated, in substance:

- a. He had stolen the metals he sold from Victim Company 1 in Rhode Island and then sold the metals in Massachusetts;
- b. He had left the metal that he had stolen from Victim Company 1 on or about March 1, 2024 in the possession of Person One at an apartment in Mattapan, Massachusetts; and
- c. He sold metal stolen from Victim Company 1 to a different metals dealer in Randolph, Massachusetts within the last month.

14. During the search of PREACHER's home, law enforcement agents found and seized precious metal in scrap form. Below is an image of the metals that law enforcement personnel seized from PREACHER's home on or about March 14, 2024.



Scope and Value of the Scheme

15. In the course of this investigation, I obtained records from and interviewed personnel at a metals dealer in Canton, Massachusetts (the “Canton Dealer”). The Canton Dealer’s records reflect that PREACHER sold precious metals to the Canton Dealer from about in or about March 2020 to in or about March 2023. The sales took place roughly one to two times each month. The sales aggregate to more than \$1 million.

16. Below is an example of a Canton Dealer invoice recording the sale of \$50,521.88 in 18-carat gold in March 2020.

-----SETTLEMENT-----					
Date:	17-Mar-20				
Customer:	Benjamin Preacher Jr.				
	[REDACTED]				
	N. Attleboro, MA				
Phone:					
Notes:					
DESCRIPTION	WEIGHT	UNIT		PRICE	TOTAL
18k	1,616.70	grams		\$31.25	\$50,521.88
					\$0.00
90% Pt	34.60	grams		\$15.05	\$520.73
					\$0.00
Bench Scrap	105.10	grams		\$12.00	\$1,261.20

17. Below is an example of a Canton Dealer invoice recording the sale of \$21,821.56 in 18-carat gold, “Platinum scrap,” and “Sterling” in April 2021.

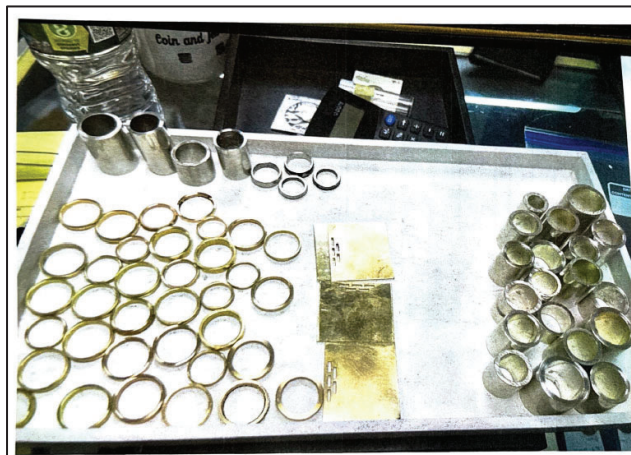
-----SETTLEMENT-----					
Date:	23-Apr-21				
Customer:	Benjamin Preacher Jr.				
	[REDACTED]				
	N. Attleboro, MA				
Phone:					
Notes:					
DESCRIPTION	WEIGHT	UNIT		PRICE	TOTAL
18k	376.60	grams		\$35.00	\$13,181.00
					\$0.00
Platinum Scrap	255.80	grams		\$28.80	\$7,367.04
					\$0.00
Sterling	64.81	ozt		\$19.65	\$1,273.52

18. Below is an example of a Canton Dealer invoice recording the sale of \$30,939.13 in platinum in January 2022.

-----SETTLEMENT-----				
Date:	24-Jan-22			
Customer:	Benjamin Preacher Jr.			
	[REDACTED]			
	N. Attleboro, MA			
Phone:	[REDACTED]			
Notes:	[REDACTED]			
DESCRIPTION	WEIGHT	UNIT	PRICE	TOTAL
				\$0.00
				\$0.00
Platinum	1,302.70	grams	\$23.75	\$30,939.13

19. I also obtained and reviewed business records from a West Bridgewater metals dealer (the “West Bridgewater Dealer”). The records reflect PREACHER’s sale of gold, platinum, and silver between on or about May 16, 2023 and on or about November 16, 2023, and included images of the metals PREACHER sold.

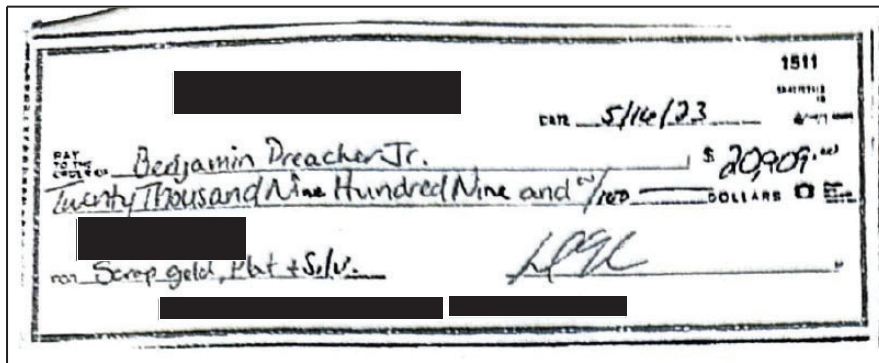
20. On or about February 5, 2024, law enforcement agents showed images of the metals from the West Bridgewater Dealer to two Victim Company 1 manufacturing personnel. Both recognized the metals as typical of the metals and the form of the metals used at the Rhode Island facility where PREACHER worked. One of the employees recognized the rectangular metal sheets in the lower middle of the image below as being gold sheets that Victim Company 1 uses in a particular machine at its facility in Rhode Island. The image below pertains to PREACHER’s sale of metals to the West Bridgewater Dealer on or about May 16, 2023 for \$20,909.



21. Records that I obtained and reviewed from the West Bridgewater Dealer also

included checks to PREACHER for sales of metals from on or about May 16, 2023 to November 16, 2023, totaling \$177,062.

22. Below is an image of a check for \$20,909 for the May 16, 2023 transaction with the West Bridgewater Dealer pertaining to the metals pictured above; according to bank records, PREACHER deposited the check by ATM at a grocery store in Massachusetts on or about May 17, 2023.



23. I have reviewed PREACHER's bank and credit card records and could neither identify any source of income for PREACHER to acquire the amount of metals he sold nor find any transaction showing that PREACHER ever purchased precious metals in scrap or raw form.

24. Based on the information detailed above, there is probable cause to believe that starting no later than March 2020, PREACHER transported precious metals valued over \$5,000 from Victim Company 1 in Rhode Island into Massachusetts, knowing the precious metals to have been stolen, converted, or taken by fraud, in violation of 18 U.S.C. § 2314.

25. Based on the information detailed above, there is probable cause to believe that on or about May 17, 2023, PREACHER knowingly engaged in a monetary transaction in criminally derived property greater than \$10,000, that was derived from specified unlawful activity, to wit, interstate transportation of stolen goods, in violation of 18 U.S.C. § 1957.

Sworn to under the pains and penalties of perjury,

Respectfully submitted,

Rebecca Limage DLC

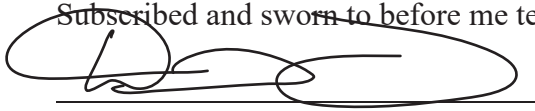
REBECCA LIMAGE

Special Agent

Internal Revenue Service

Criminal Investigations

Subscribed and sworn to before me telephonically pursuant to Rule 4.1(a) on March 14, 2024.


DONALD L. CABELL
Chief United States Magistrate Judge

